



INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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12 June 2003

Docket Management Facility
[USCG-2002-10714]
Department of Transportation, room PL-401
400 Seventh Street, SW
Washington, DC 20590-0001

Re: Update of Rules on Aids to Navigation Affecting Buoys, Sound Signals, International Rules at Sea, Communications Procedures, and Large Navigational Buoys

To Whom It May Concern:

The International Association of Drilling Contractors is a trade association representing the interests of the owners and operators of oil, gas, and geothermal well drilling equipment worldwide. Our membership includes all companies currently operating mobile offshore drilling units (MODUs) under U.S. flag, all companies operating MODUs in areas subject to the jurisdiction of the United States, and all companies operating MODUs competitively, worldwide.

In response to the Notice of Proposed Rulemaking appearing in the 14 May 2003, *Federal Register* we offer the following comments:

1. Given the number of security zones that have been recently established, and the number of additional security zones that are likely to be established, the Coast Guard should establish a “special mark” or “regulatory mark” with unique coloration and light characteristics for delimiting security zones.
2. The Coast Guard should establish additional means (*e.g.*, telephone, facsimile, e-mail, etc.) for receiving reports of defects or discrepancies in navigational aids §62.65(c)(2) should be revised accordingly.
3. We understand that the Coast Guard will be proposing new rules to, among other things, mandate certain vessels be equipped with Automatic Identification Systems (AIS) as aids to navigation. It would appear appropriate to consider allowing certain offshore installations and shore facilities to be equipped to transmit AIS information (*e.g.*, temporary, or newly established security zones). When the AIS regulations are proposed, the Coast Guard should consider the need to revise §66.01-1(d) to allow such installations and facilities to apply for authorization to transmit AIS information.

4. The second sentence of §66.10-15 (b) should be revised by removing the word “a” in the phrase “looking upstream or toward the head of a navigation.”
5. We would recommend further guidance be provided in §67.01-5 (a) regarding the applicability of the “structures” requirements to mobile offshore drilling units (MODUs). We would specifically suggest that the list of examples be expanded to include “self-elevating MODUs elevated on location” and “floating MODUs when attached to the seabed by a marine drilling riser.” While there is consistency in the application of the term “structure” to these units in the Gulf of Mexico, there has been historic inconsistency in other regions. It would be helpful if consistency could be achieved at this time, through rulemaking, while no such units are operating in areas of U.S. jurisdiction outside the Gulf of Mexico.
6. As we have indicated in other rulemakings, we believe that the Coast Guard should carefully differentiate between the actual “range” of sound signals and the “approved,” “rated,” or “nominal” range of such signals in its regulatory requirements. The actual range of such devices is dependent upon atmospheric conditions and cannot be assured. Regulations requiring sound signals should do so by referring to an approved, rated, or nominal range. Regulations where this change should be made include §§67.10-1(c), 67.10-5(a), 67.10-10(a)(3), 67.10-20, 67.10-25(a)(3), 67.20-10, 67.25-10, and 67.30-10.
7. We recommend that §67.10-5(b) revised to read: “Be located on the structure so that the sound signal produced is audible over 360 degrees in a horizontal plane at all distances up to and including the required range.”
8. We recommend that §67.10-20(a)(2) be revised to allow the Coast Guard to accept the use of sound level meters other than the ones which it supplies by referencing an appropriate industry specification for a meter that meets or exceeds the standards of the meter used by the Coast Guard.
9. It appears that one use of “his” was overlooked in the preparation of this proposal. We recommend that §67.10-25(a)(1) be revised to eliminate “his.”
10. We recommend that §67.10-25(b) be revised to provide guidance regarding how “all expenses of the U.S. Government in sending a Coast Guard representative to the test” are to be calculated. Does this include pro-rated salaries, or only additional costs of travel, etc.
11. In §67.15-10(a), it appears that the reference to “Subpart 62.25” should be revised to refer to “Subparts 62.23 to 62.33.”
12. With regard to §§67.20-5 and 67.25-5(a), we would reiterate our comments from earlier rulemakings that we believe that the regulatory requirement that “lights shall be of sufficient candlepower to be visible at a distance of at least five nautical miles 90 percent of the nights of the year” is inappropriate. The requirement should be replaced by a requirement that lights for a specified range meet specific minimum intensity requirements based upon a desired range. As the requirement is written, specialized studies of historic

atmospheric conditions for each light would be required and would need to be continuously revalidated.

13. In §67.20-5, the reference to §67.05-1(f) seems to be in error since §67.05-1(f) does not address a maximum height for lights. The cross-reference should be corrected.

14. In §67.25-10(a)(2) “less than 3 provisions of paragraph (b) or (c) of this section,” the “3” appears to be in error and should be corrected.

If you have any questions about these comments, please feel free to contact me by phone at (281) 578-7171, ext. 207.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Spackman". The signature is fluid and cursive, with a large initial "A" and a long, sweeping underline.

Alan Spackman
Director, Offshore Technical
and Regulatory Affairs

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